

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Norfolk Division**

**CSX TRANSPORTATION, INC., individually
and on behalf of NORFOLK & PORTSMOUTH
BELT LINE RAILROAD COMPANY,**

Plaintiff,

v.

Case No. 2:18-cv-00530-MSD-LRL

**NORFOLK SOUTHERN RAILWAY COMPANY,
NORFOLK & PORTSMOUTH BELT LINE
RAILROAD COMPANY, JERRY HALL, THOMAS
HURLBUT, PHILIP MERILLI, and CANNON MOSS,**

Defendants.

**CONSENT MOTION TO WITHDRAW COUNSEL
AND INCORPORATED MEMORANDUM IN SUPPORT**

The Defendant, Norfolk Southern Railway Company (“NSR”), by counsel, pursuant to this District’s Local Civil Rule 83.1(G), moves the Court to allow the law firm of Christian & Barton, L.L.P. and its lawyers (collectively “C&B”)¹ to withdraw as its counsel of record in this matter. NSR, whose present counsel of record at Troutman Sanders LLP will remain in the case to defend and otherwise represent the interests of NSR, consents to the relief sought by this motion, as do Plaintiff and NSR’s Co-Defendants. In addition, no party to this action will be prejudiced by the grant of this motion.

WHEREFORE, Defendant Norfolk Southern Railway Company respectfully asks that its motion be granted. A proposed order is attached for the Court’s consideration.

¹ The names of the five (5) C&B lawyers who have appeared of record in this case are set forth in the signature block on the following page.

Dated: October 23, 2019

Respectfully submitted,

**NORFOLK SOUTHERN RAILWAY
COMPANY**

By Counsel

/s/

Michael W. Smith (VSB No. 01125)
Craig T. Merritt (VSB No. 20281)
R. Braxton Hill IV (VSB No. 41539)
Belinda D. Jones (VSB No. 72169)
S. Perry Coburn (VSB No. 78372)
CHRISTIAN & BARTON, L.L.P.
909 East Main Street, Suite 1200
Richmond, Virginia 23219
Tel. (804) 697-4100
Fax (804) 697-4112
msmith@cblaw.com
cmerritt@cblaw.com
bhill@cblaw.com
bjones@cblaw.com
pcoburn@cblaw.com

CERTIFICATE OF SERVICE

I certify that on October 23, 2019, I will file the foregoing with the Clerk of Court using the CM/ECF system, which will send a notification of such filing (NEF) to counsel of record for all parties.

/s/

S. Perry Coburn (VSB No. 78372)

CHRISTIAN & BARTON, L.L.P.

909 East Main Street, Suite 1200

Richmond, Virginia 23219

Tel. (804) 697-4176

Fax (804) 697-6386

pcoburn@cblaw.com

2545996